

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)
)
Access Billing Requirements -) RM 8540
for Joint Service Provision)

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

REPLY TO OPPOSITION

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U S WEST Communications, Inc. ("U S WEST"), through counsel and pursuant to the Federal Communications Commission's ("Commission") Public Notice,¹ hereby replies to the Opposition of MCI Telecommunications Corporation ("MCI")² to U S WEST's Amended Petition for Rulemaking³ to eliminate the single bill requirement in cases where access service is jointly provided with other local exchange carriers ("LEC") under meet point billing arrangements.

In responding to U S WEST's original Petition for Rulemaking,⁴ MCI stated that, "US WEST should either show . . . that the single bill requirement is uneconomic or comply with the Commission's rules."⁵ There was some basis for this

¹ Public Notice, US WEST Files Amendments To Its Request For Extension Of Waiver And Petition For Rulemaking Regarding Meet Point Billing Requirements (RM No. 8540), DA 95-2195, rel. Oct. 19, 1995.

² Opposition of MCI, filed herein Oct. 26, 1995 ("MCI Opposition").

³ U S WEST Amended Petition for Rulemaking, filed herein Oct. 3, 1995 ("Amended Petition").

⁴ U S WEST Petition for Rulemaking, filed herein Nov. 1, 1994 ("Original Petition").

⁵ Opposition of MCI, filed herein Dec. 7, 1994 at 5.

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criticism since U S WEST's Original Petition contained no quantitative evidence. In order to correct this deficiency and provide the Commission with more information with which to make a decision, U S WEST amended its Original Petition to include two highly relevant pieces of economic information: 1) measures of single bill costs for those LECs with which U S WEST had been unable to reach billing agreements and 2) data on the amounts billed by LECs for U S WEST under existing single bill agreements.⁶

In opposing U S WEST's Amended Petition, MCI takes issue with U S WEST's interpretation of the data contained in Attachment B (revised)⁷ on the number of invoices processed by U S WEST under the single bill requirement.⁸ While MCI may interpret the invoice data in Attachment B (revised) any way it sees fit, the data speaks for itself. The Commission can decide whether U S WEST's conclusions are reasonable or not. The fact remains -- regardless of how much one assumes it costs to process a single bill invoice -- that approximately 20 percent of U S WEST's single bill invoices are for less than a dollar and 61 percent for less than \$25. As a result, U S WEST remains firm in its belief that "it makes no economic sense to bill for jointly provided access in approximately 60 percent of the

⁶ See Amended Petition, Attachments A and B (revised).

⁷ MCI Opposition at 3-4.

⁸ For example, MCI states that "U S WEST files Attachment B and claims that it shows about 20 percent of its single bill requirement invoices 'make[] no economic sense to bill' because the invoice amount is less than \$1. But since we have no reasonable cost information, it is not clear whether this is unreasonable or not." *Id.* at 3.

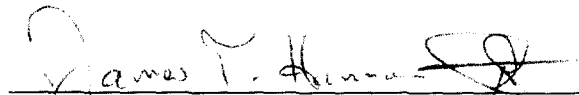
cases.”⁹ Furthermore, contrary to MCI’s claim, U S WEST believes that billing verification problems arising in a multiple bill environment have been largely eliminated through the adoption of LATA level billing enhancements.¹⁰

As U S WEST demonstrated in its Amended Petition, circumstances have changed significantly since the single bill requirement was adopted in 1988. Any remaining benefits of the single bill requirement are far outweighed by the costs of complying with it. Therefore, U S WEST requests that the Commission initiate a rulemaking to eliminate this requirement at the earliest possible date.

Respectfully submitted,

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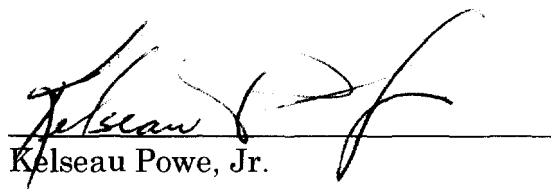
November 2, 1995

⁹ Amended Petition at 4-6.

¹⁰ Id. at 7-10 and nn. 15, 16.

CERTIFICATE OF SERVICE

I, Kelseau Powe, Jr., do hereby certify that on this 2nd day of November, 1995, I have caused a copy of the foregoing **REPLY TO OPPOSITION**, to be served via first-class United States Mail, postage prepaid upon the persons listed on the attached service list.



Kelseau Powe, Jr.

***Via Hand-Delivery**

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